

AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

 Original Duplicate Original

LODGED	
CLERK, U.S. DISTRICT COURT	
7/28/2023	
CENTRAL DISTRICT OF CALIFORNIA	
BY:	TV DEPUTY

UNITED STATES DISTRICT COURT

FILED	
CLERK, U.S. DISTRICT COURT	
07/28/2023	
CENTRAL DISTRICT OF CALIFORNIA	
BY:	jm DEPUTY

United States of America

v.

RYAN SCOTT BRADFORD,
DefendantCentral District of California
Case No. 2:23-mj-03803**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the dates of May 1, 2021 to present in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section**Offense Description**See Complaint**See Complaint*

This criminal complaint is based on these facts:

Please see attached affidavit. Continued on the attached sheet.*Complainant's signature*Peter Rein DEA Special Agent*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 7/28/2023


Judge's signature
City and state: Los Angeles, CaliforniaHon. Michael R. Wilner, U.S. Magistrate Judge*Printed name and title*

AUSA: El-Amamy

AFFIDAVIT

I, Peter Rein, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent for the United States Drug Enforcement Administration ("DEA") and have been so employed since October 28, 2019. I completed the DEA Basic Agent Training Course, an 18-week intensive training program at the DEA Academy in Quantico, Virginia, where I received over 300 hours of comprehensive, formalized instruction in such matters as drug identification, detection, and interdiction; money laundering techniques; and asset identification, seizure, and forfeiture. As a DEA Special Agent, I have participated in several investigations involving the trafficking, smuggling, and distribution of drugs by small and large-scale domestic and foreign drug trafficking organizations ("DTOs"). I have become familiar with the methods used by individuals involved in DTOs to conduct various criminal activities, including the unlawful importation, transportation, and distribution of controlled substances, money laundering, and firearms offenses. I have also become familiar with the methods used by such individuals to avoid detection by law enforcement, including the frequent use of multiple cellular telephones, including telephones that are subscribed to in the names of other persons, prepaid cellular telephones, counter-surveillance techniques, coded and ambiguous language, multiple vehicles, and false identities. The decisions I have made and conclusions I have reached are based not only upon my own training and experience, but also on

the training and experience of other federal agents and Task Force Officers with whom I have discussed this case.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, RYAN SCOTT BRADFORD ("BRADFORD") for violations of Title 21, United States Code, Section 846: Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance; and Title 18, United States Code, Section 922(g)(1): Felon in Possession of Ammunition.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, with typographical errors in the original, and all dates and times are approximate.

III. STATEMENT OF PROBABLE CAUSE

A. BRADFORD Posts Messages Regarding Building Firearms and Committing Mass Killings of Jews

4. Through open-source research, Federal Bureau of Investigation ("FBI") employees identified a publicly available Amazon account with the username "Peck Erwood," the avatar for which is a "Mr. Horsepower" woodpecker logo. Based on my training and experience, I am aware that the woodpecker is a

logo used by members of the San Fernando Valley Peckerwoods ("SFVP" or the "Peckerwoods"), a racially motivated violent extremist group based in Los Angeles County. The Peckerwoods originated in the California State prison system and its members have engaged in racially motivated violence, drug and illegal firearms trafficking, and fraud.

a. Amazon records identify the subscriber for the "Peck Erwood" account as BRADFORD, using the telephone number (747) 221-****, the email address pecke.erwood88@gmail.com, and the address **** White Oak Ave, Reseda, California.

b. Based on my review of BRADFORD's Amazon account, I am aware of the following:

i. On January 8, 2021, BRADFORD posted an Amazon review for a drill press and included two photographs in the product review. One of the photographs appears to depict the lower receiver of an AR-pattern rifle. Based on my training and experience, I know that a drill press is used to assemble firearms, specifically by drilling holes in the lower receiver.

ii. On May 14, 2021, BRADFORD posted a review for a filament and included three photographs and one video in the product review. The video appears to depict a 3-D printer layering the frame of a firearm. The three photographs appear to show the same firearm frame in varying stages of manufacture. Based on my training and experience, I know that filament is a material used for 3-D printing, including for 3-D printing

firearms. The review also included a comment about a "fanatical (((talmudic))) liar."¹

iii. On June 5, 2021, BRADFORD posted an Amazon review of a 3-D printer motherboard and included a photograph of his left hand holding the motherboard. A tattoo on his left index finger reads "HATE". FBI Task Force Officer James Grey compared the photograph to a 2017 booking photo of BRADFORD and recognized the "HATE" tattoo on the left index finger of the individuals in both photographs to closely resemble one another.

iv. Based on the foregoing and my training and experience, I believe BRADFORD's posts above reflect his use of a 3-D printer, drill press, and filament to manufacture firearms.

5. On June 5, 2021, BRADFORD posted a review for a car tent on Amazon and included several photographs of vehicles. The license plate for a large RV in the photo is 3KN200. Based on law enforcement databases, that plate is registered to a 1994 Chevrolet P30 motor home with VIN 1GBKP37N7R332521. Adriana Gutierrez ("GUTIERREZ") is listed as the registered owner of the RV.

6. LAPD's Major Crimes Surveillance Support team conducted surveillance at **** White Oak Ave, Reseda, CA, which is the address associated with BRADFORD's Amazon account, as discussed above. At that location, officers saw the RV with

¹ Based on my knowledge and experience, I am aware that the Talmud" is an important text in the Jewish religion, and the triple parentheses is frequently used by white supremacy extremists as a derogatory symbol used to identify individuals with a Jewish background.

license plate 3KN200 parked in the driveway. Officers also observed two individuals whose appearances matched DMV and booking photographs of GUTIERREZ and BRADFORD.

7. Based on open-source records, GUTIERREZ's phone number is (747) 389-****, which is linked to Telegram account "@SFVFeather."² "@SFVFeather" is one of nine members of the publicly available Telegram chat group "National Socialist Peckerwood Death Squad - Seething Hate From the 818" ("NSPDS") which is run by "@Peck_erwood818," who presents his username as "Peck Erwood." As noted above, "Peck Erwood" is BRADFORD's username on his Amazon account. The "Peck Erwood" Telegram account also uses the same "Mr. Horsepower" woodpecker logo BRADFORD uses on his Amazon account.

8. On October 8, 2021, "Peck Erwood" posted in NSPDS: "Archive.org or email me at wpeck393@gmail.com." Based on subscriber records, GUTIERREZ is the registered subscriber for wpeck393@gmail.com.

9. Also on October 8, 2021, "Peck Erwood" posted in NSPDS: "Hmu³ 747221 4226 if you want to blow up. Test c e deca after cycle everything you need to pack on 30 lbs of muscle in 12 weeks." On May 25, 2023, I reviewed Paypal records related to BRADFORD, which listed 7539 White Oak Ave, Reseda, CA 91335 as his address. Those records reflect the following:

² Based on my training and experience, I believe "SFV" refers to "San Fernando Valley."

³ Based on my training and experience, I believe that "Hmu" is short for "hit me up" and "deca" is a reference to a steroid.

a. From July 2020 through January 2022, BRADFORD's Paypal account was associated with the same phone number "Peck Erwood" posted on Telegram on October 8, 2021: (747) 221-****.

b. From October 2022 through May 2022, BRADFORD's Paypal account was associated with the phone number used by the "peck.erwood88" TextNow⁴ account: (747) 221-****.

10. Accordingly, I believed BRADFORD is the operator of the "Peck Erwood" Telegram account. BRADFORD used that account throughout 2022 to post threatening messages on Telegram regarding killing Jews, including the following:

a. On March 9, 2022, BRADFORD posted on the "14 Words"⁵ Telegram channel: "I can't promise I can kill all the Jews overnight, but long before I die of old age."

b. On July 17, 2022, BRADFORD posted on the "White Lives Matter USA California" Telegram channel: "Ready to kill some jews with us? The white boys are gunna kick it off we've had enough of this kike⁶ bullshit what about you? It would be great if the blacks could just go with the flow for once instead of being a pain in our asses, how bout it?"

c. On September 8, 2022, BRADFORD posted various links and instructional manuals on the NSPDS Telegram channel,

⁴ Based on my training, experience, and knowledge of the investigation, I am aware that TextNow is a service that allows users to send and receive text messages and phone calls when connected to wireless internet.

⁵ Based on my training and experience, I am aware that "14 Words" is a reference to a slogan frequently used by white supremacy extremists: "We must secure the existence of our people and a future for white children."

⁶ Based on my training and experience, I know that "kike" is a derogatory term for a Jewish person.

including "A collection of pyrotechnic compositions," "A German-English dictionary for chemists," "Aryan Revolution," "Bazooka How to Build Your Own Paladin Press," "Biological Warfare FAQ," "Do it Yourself Gunpowder", "Expedient Hand Grenades," "United States Jewry," and an "Explosives How-To."

d. On October 21, 2022, BRADFORD posted on the NSPDS Telegram channel a video called "WHITE TERROR," with the following description: "24min documentary timeline chronicling the attacks carried out by every Saint in the Pantheon (April 1968--May 2022). Join us and celebrate our glorious and bloody legacy of White Terror." I have reviewed the video, which depicts various racially motivated attacks and refers to each violent attacker as a "saint."

e. On November 13, 2022, BRADFORD posted on the NSPDS Telegram channel: "Dear America, Voting will not take back your country when it is the Jews that count your votes. . . This is just making the country think that it's the blacks that have beef with the Jews, get in line blacks, Aryans are settling our shit with the kikes, if there are any left after you can have your shot."

11. In posting the "WHITE TERROR" video on October 21, 2022, BRADFORD invited his followers to view the "documentary" on alternative media platforms, including Bitchute, Internet Archive, and WorldTruth Videos. I reviewed publicly available social media accounts on those platforms that use similar names as the "Peck_erwood818" Telegram account, including "Peck.erwood23" on Bitchute, "Peckerwood818" on Archive.org, and

"@Peckerwood23" on WorldTruth Videos. Those accounts use the same unique avatar -- a logo of a "Mr. Horsepower" woodpecker -- as BRADFORD uses for his Amazon account and the "@Peck_erwood818" Telegram account. Those accounts also use similar rhetoric to that which appears on BRADFORD's Amazon account and the "Peck_erwood818" Telegram account, as detailed below. Furthermore, as noted below, the WorldTruth account posted GUTIERREZ's email account and a photograph of BRADFORD's hand. Accordingly, I believe BRADFORD is the operator of these accounts as well. Between May 2021 and January 2023, the accounts posted additional statements regarding firearms and killing Jews, including the following:

a. In May 2021, "@Peckerwood23" (who presents his username as Peck Erwood, the same as BRADFORD's Amazon account and "@Peckerwood818"'s Telegram account), posted on WorldTruth Videos in response to a comment from user "millhouse," who posted "The blueprints for a 3D printed 9mm Glock are online, technically anyone with a 3D printer can make one." Peck Erwood responded: "I've got other models also hmu wpeck393@gmail.com, or if you have any 3d related questions." The wpeck393@gmail.com address is the same address BRADFORD posted on Telegram on October 8, 2021. In the post, "@Peckerwood23" included a photograph depicting a hand with a "HATE" tattoo on the left index finger holding a 3D printer motherboard, which is the same photograph BRADFORD posted on an Amazon product review. Based on my review of the post, my knowledge of this investigation, and my training and experience, I believe that

when BRADFORD wrote that he had "other models," he was referring to models of firearms.

b. On March 1, 2022, "Peckerwood818" posted a comment on an Archive.org page for a manifesto written by John Earnest, who shot multiple victims at a synagogue in Poway, California, in 2019. "Peckerwood818" commented: "Oy Vey! Fuck off kike. Shoah is coming."⁷

c. On June 1, 2022, "Peck.erwood23" posted on Bitchute: "There's one solution, and it relies purely on killing the jews".

d. In January 2023, "@Peckerwood23" (who presented his username as Peck Erwood) posted on WorldTruth Videos: "My wifes sister, her boyfriend has been making shirts and stuff lately. . . My 'which one of you kikes wants to fight' shirt isnt getting the response I wae [sic] hoping. Coward jews. Im adding the hitler pissing on jews car window figure people sticker. . ."

e. Also in January 2023, "@Peckerwood23" posted on WorldTruth Videos: "I dont care about being labled [sic] a criminal, i am a criminal. . . I live plush, steal what I need and do fruad [sic] to get what is out of reach. My wife wants for nothing and we never go without. While I fine tune my many specialties and skills, and get to focus on the fight i feel obligated to dedicate myself to completely, until the end. I

⁷ Based on my training and experience, I am aware that "Shoah" is the Hebrew term for the Holocaust.

thirst for blood. . .I desire revenge for the destruction of the Reich. . .for what? For these disgusting pedophile kikes."

12. Based on my review of records provided from California's Employment Development Department, BRADFORD uses the telephone number (747) 221-9232. Based on law enforcement databases, I am aware that the service provider for (747) 221-9232 is TextNow. I have reviewed subscriber records from TextNow which confirm that the "peck.erwood88" TextNow account is registered to BRADFORD, with the phone number (747) 221-9232, the username "pecke.erwood88," and the email address pecke.erwood88@gmail.com.

B. BRADFORD Conspires to Distribute Methamphetamine

13. Based on subscriber and toll records provided by TextNow, I am aware that BRADFORD used the "peck.erwood88" TextNow account to communicate with other persons who are known to law enforcement as members of the SFVP, including Kris DRAKAKIS ("DRAKAKIS").

14. On June 2, 2023, the Honorable Rozella A. Oliver, United States Magistrate Judge, issued a search warrant in Case Number 23-MJ-02837 for the "peck.erwood88" TextNow account.

15. On June 30, 2023, the government filed an indictment against DRAKAKIS charging him with 21 U.S.C. §§ 841(a)(1), (b) (1) (A) (viii), (b) (1) (B) (i), and (b) (1) (A) (vi) (Possession with Intent to Distribute Methamphetamine, Heroin, and Fentanyl; 18 U.S.C. § 924(c)(1)(A)(i) (Possession of a Firearm in Furtherance of Drug Trafficking Crimes); 18 U.S.C. § 922(g)(1)

(Felon in Possession of Ammunition) in United States v.

Drakakis, CR No. 2:23-cr-00328-JLS.

16. On July 25, 2023, the Honorable Karen L. Stevenson, United States Magistrate Judge, issued a search warrant in Case Number 23-MJ-03718 (C.D. Cal.), authorizing an additional search of the "peck.erwood88" TextNow account.

17. As detailed below, Based on my review of records provided by TextNow, BRADFORD has used the "peck.erwood88" TextNow account to engage in drug distribution activity with DRAKAKIS.

1. November 12, 2022⁸

a. On November 12, 2022, BRADFORD used the "peck.erwood88" TextNow account to participate in the following text message exchange with DRAKAKIS:

DRAKAKIS: Did you think that stuff was better.?

BRADFORD: actually yeah i think so , what about you?

DRAKAKIS: Definitely better I just hate going to the toad you know what I mean.

BRADFORD: oh , i know exactly what you mean. i can ask my boy that lives down the street with the roommate we were talking about, that has all that weight, hes got the shit also. maybe get some to checkout and see if i can get you plugged in with him if the price is right and all that. as far as i know hes a homeboy so it should be all good

⁸ All text messages in this affidavit are copied verbatim, including with any typographical errors.

DRAKAKIS: I mean that would be great and I really appreciate it plus hopefully this shit's a lot better..... Haha

BRADFORD: and if its not ill just gangbang on that fool. if im not mistaken he just got out somewhat recently from doing ten so i think it should be a ok

BRADFORD: fingers crossed right . cant get much worse knock on wood lol

DRAKAKIS: LoL Ã°Å,Ã¤Å£

BRADFORD: how much ballpark would u want to get so i can get prices for , a zip or ..?

b. Based on my training, experience, and knowledge of the investigation, I believe that, in this text message exchange, BRADFORD and DRAKAKIS discussed the quality of drugs that DRAKAKIS was currently supplying, and BRADFORD acknowledged that he was able to obtain better quality drugs from a different source of supply. I believe that BRADFORD identified an individual who had a large quantity of good quality drugs, or "all that weight . . . [that is] the shit." I believe that BRADFORD agreed to approach the source of supply to see if the individual would be willing to supply DRAKAKIS with drugs to distribute. Finally, I believe that BRADFORD asked DRAKAKIS the price at which DRAKAKIS wanted to obtain drugs from the potential source of supply, including the price per ounce, or price per "zip."

2. November 13, 2022

a. On November 13, 2022, BRADFORD used the "peck.erwood88" TextNow account to participate in the following text message exchange with DRAKAKIS:

DRAKAKIS: I'm just down the street off Reseda and Saticoy I'll be right there in a few minutes buddy

BRADFORD: Ok let me know when your here I'll bring your bag out . Idk what your doing I'm just cleaning and cooking dinner

DRAKAKIS: If you want I can just come back after you guys have dinner

• • •
BRADFORD: Well you just grabbing your bag or you trying to kick it or

DRAKAKIS: I mean I'm down to kick it for a bit if you are

BRADFORD: I can shoot this to you no problem but my wife's already bitching and wanting to get dick and probably don't want to hang out she's gonna get bitchy lol

BRADFORD: No to you but me I know how she is

DRAKAKIS: Okay well no problem brother I'll swing by in a few but take some out for you okay at least fill up your container and we can just kick it some other day no worries.

BRADFORD sent the following photograph:



BRADFORD: Where you at

DRAKAKIS: Come on boy can you please take a little bit more and I'll be there in about 5 minutes or so

DRAKAKIS: And I didn't mean to call you boy I meant homeboy AKA stud muffin grab some more than that please thank you

BRADFORD: Ok

BRADFORD sent the following photograph:



BRADFORD: Is that better dick?!?

DRAKAKIS: I knew you were going to do that

BRADFORD: Lol

BRADFORD: I threw the whole thing into another big bag so it's doubled up do you have a bunch of bags or your just putting it up like this ?

DRAKAKIS: Just like that probably

BRADFORD: Ok then

b. Based on my training, experience, and knowledge of the investigation, I believe that BRADFORD possessed a large quantity of methamphetamine that DRAKAKIS had obtained from a source of supply and showed a picture of methamphetamine that he was holding for DRAKAKIS to DRAKAKIS via text message. I believe that DRAKAKIS let BRADFORD keep a portion of the methamphetamine for personal use in exchange for storing and packaging the methamphetamine for DRAKAKIS.

C. BRADFORD Illegally Manufactures and Possesses Firearms

18. Based on my review of certified conviction records, I am aware that on or about October 30, 2012, in Case Number LASPA07300001, in the Superior Court of California, County of Los Angeles, BRADFORD was convicted of burglary, in violation of California Penal Code Section 459, which is punishable by imprisonment for a term exceeding one year.

19. Based on my review of TextNow messages, BRADFORD, who is a convicted felon, used the "peck.erwood88" TextNow account to discuss his illegal assembly and possession of firearms:

1. December 20, 2021⁹

a. On December 20, 2021, BRADFORD used the "peck.erwood88" TextNow account to send the following text messages to the user of telephone number (818) 824-****:

BRADFORD: We gotta go shooting again I made this silenc3r for the rifle and made them both full auto

BRADFORD: And Made bigger magazines

BRADFORD: And I got this jig it was 300 bucks that helps you finish the 80% lower receivers so you can make your own ar 10 or 15 ez. And even put your own serial number on it so you can register in your name so you don't get in trouble and all that

b. Based on my training, experience, and knowledge of the investigation, I believe that, with these messages, BRADFORD informed the user of telephone number (818) 824-**** that he had manufactured a firearm silencer and a fully automatic rifle. Additionally, I believe that BRADFORD stated that he currently has the ability to manufacture AR-10 and AR-15 rifles, and to avoid federal firearms registration requirements by generating false firearm serial numbers.

2. August 17, 2022

a. On August 17, 2022, BRADFORD used the "peck.erwood88" TextNow account to participate in the following text message exchange with DRAKAKIS:

⁹ All text messages in this affidavit are copied verbatim, including with any typographical errors.

BRADFORD: DID you talk about a price with your friend
that wanted that

BRADFORD: BEcause that's what it boils down to

DRAKAKIS: I mentioned it was around 9 but I wasn't
100% that I had to.o talk to you

BRADFORD: OK see that's good

BRADFORD: Thats enough we should be able to get the
parts , the plastic I need , and like a hundred bucks
for each of us its perfect just depending on how much
parts are right now

BRADFORD: If you wanted one too they have g19 and 17
slides on sale for 119 thats the cheapest I've ever
seen them thats a crazy price . the 26 slides are on
sale right now like 160

DRAKAKIS: yeah that would be great does the slide
come as a kit with other stuff .

BRADFORD: No its just that

BRADFORD: Then u need a barrel I think I can get one
around 60 bucks , a parts and trigger kit maybe like
70 bucks , the rails like 50 bucks and then just have
to print a frame

BRADFORD: I'd have to check around for prices on
yours if your trying to do that , but its a few
hundred all together depending but no the slide is
only one of 3 major components you need plus the
handfull of other less major things

BRADFORD: When you find out your boy is for real you should come thru and I'll show u and we can solidify a price

DRAKAKIS: for sure sounds good I'll talk to him tomorrow for sure and I'll let you know what's going on.

b. Based on my training, experience, and knowledge of the investigation, I believe that, in this text message exchange, BRADFORD and DRAKAKIS discussed an individual who may be interested in purchasing a firearm that BRADFORD would manufacture. DRAKAKIS told the potential customer that the price of the manufactured firearm was \$900, and BRADFORD explained that, if they sold the manufactured firearm at that price, each of them would make \$100 profit. DRAKAKIS said that he would check with the potential customer the next day in order to verify any purchase. Finally, BRADFORD offered to manufacture a firearm for DRAKAKIS.

3. January 6, 2023

a. On January 6, 2023, BRADFORD used the "peck.erwood88" TextNow account to send the following text message exchange with the user of telephone number (323) 627-****:

BRADFORD: Hey its ryan

BRADFORD: My bad about the note i hope your daughter doesn't think im some lunatic lol. I was just starting to feel like type of way.... I also wanted to show you these things i make...

BRADFORD then sent the user of telephone number (323) 627-***** the following photographs:



(323) 627-*****: Holy shit! Those work?

BRADFORD: Yes of course

BRADFORD then sent the user of telephone number (323) 627-***** the following photographs:



BRADFORD: I fuck around. Trying to take over the world so i gotta have skills

BRADFORD: 3d printed mp5 with ar 15 trigger assembly and bolt

BRADFORD then sent the user of telephone number (323) 627-**** the following photograph:



20. Based on my training, experience, and knowledge of the investigation, I believe that, with these messages, BRADFORD informed the user of telephone number (323) 627-**** that he had the ability to manufacture firearms, and that he used a 3d printer to manufacture those firearms.

D. Search of BRADFORD's Residence

21. On July 26, 2023, the Honorable Pedro V. Castillo, United States Magistrate Judge, issued a search warrant for BRADFORD's residence in Reseda, California in Case Number 23-MJ-03750.

22. On July 27, 2023, law enforcement officers executed the warrant and searched BRADFORD's residence. Based on my

conversations with law enforcement officers who participated in the search, I am aware that they found, among other things:

a. Seventy-six (76) 9mm Luger rounds, Thirty-three (33) .556 rounds, and Seven (7) 762 rounds;

b. Two (2) 3D printed lower pistol receivers. Two (2) 3D printed auto sears, which were identified by LAPD's Gun Unit as parts to make a firearm automatic, and approximately five (5) switches to convert handguns into automatic weapons;

c. Two (2) 3D printers were found in the subject's residence. One is Bond Tech brand and has a delivery sticker with BRADFORD's name and phone number attached. The second is a large, black 3D printer with two swastikas painted on it;

d. Approximately thirteen (13) presumed energetic substances were taken from the scene in the form of liquids or dark powders, consistent with that of low explosive powder.

e. One (1) Improvised Explosive Device (IED), contained in one jar approximately four (4) inches tall was seized containing a dark powder consistent with the appearance of low explosive powder. The lid contained washers and screws, consistent with the appearance of fragmentation contained in explosives.

23. Law enforcement officers also found items consistent with BRADFORD's online posts, described above, regarding his violent extremist ideology and intent to kill Jews, including:

a. Two swastikas were painted on one of the 3D printers. One black and white was spray painted onto the base, and a second red one painted on the front 3D printer component;

b. Nazi flags, books, and other propaganda, including several posters of Adolf Hitler; and

c. A calendar with handwriting stating: "New Year's Resolution: Take over the world - save Aryan race *Bake every single Jew"

24. After the execution of the federal search warrant, Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agent Tiffany Lamphere, who is an Interstate Nexus Expert, examined photographs of ten rounds of ammunition recovered from BRADFORD's residence. The ten rounds of 9mm caliber ammunition with headstamp WIN were manufactured by Winchester Ammunition in Illinois or Mississippi. In order for this ammunition to be recovered in California, it had to have moved in interstate commerce.

IV. CONCLUSION

25. For the reasons described above, I respectfully submit there is probable cause to issue the requested criminal complaint and arrest warrant.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 28th day of July, 2023.


UNITED STATES MAGISTRATE JUDGE
MRW